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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

HARTFORD FIRE INSURANCE CO.,)	
Plaintiff)	
v.)	C.A. No. 03-12502 NMG
)	
EASTERN CONTRACTORS, INC.,)	
Defendant / Third Party Plaintiff)	
v.)	
CITY OF LAWRENCE,)	
Third Party Defendant)	

AFFIDAVIT OF EDWARD J. QUINLAN

I, Edward J. Quinlan, do on oath depose and state as follows:

1. I am an attorney at law admitted to practice in the Commonwealth of Massachusetts and maintain offices for the practice of law at 11 Vanderbilt Avenue, Suite 250, Norwood, Massachusetts.
2. I am counsel of record for Eastern Contractors, Inc. in this litigation, and at other times prior to the start of those litigation, including matters pertaining to the Wetherbee School Project constructed in the City of Lawrence.
3. Attached as Exhibit 1 is a true and accurate copy of correspondence dated May 21, 2003, with numerous attachments which had been sent by facsimile and regular mail to the attention of Doreen Zankowski, Esq., who at all relevant times had been acting as counsel for the City of Lawrence in connection with a variety of matters and the issues involving the City of Lawrence and Eastern Contractors.
4. During this litigation, a deposition was taken of a witness identified as Williams Jarvis, identified as a claims attorney for Hartford Insurance, which was surety on

certain bonds issued on behalf of Eastern's subcontractor, S&R Construction, on the Wetherbee School Project.

5. Attached as Exhibit 2 is a true and accurate copy of a fax transmittal sheet from Mr. Capaldo of Design Partnership of Cambridge to Mr. Jarvis of Hartford Insurance dated July 16, 2003, which had been marked as Exhibit 15 in the deposition of Mr. Jarvis that included copies of correspondence from Mr. Capaldo dated November 1, 2001, denying the claim for a renegotiation of unit cost for rock excavation.
6. Attached as Exhibit 3 is a true and accurate copy of the transcript of deposition testimony of Williams Jarvis pages 158-160 dated November 2, 2005.

Signed under the pains and penalties of perjury this 6th day of October, 2006.

/s/ Edward J. Quinlan, Esq._____